

**UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA**

STICHTING PENSIOENFONDS ABP,

Plaintiff,

v.

ALLY FINANCIAL INC. et al.,

Defendants.

Case No. 12-cv-1381 (ADM) (TNL)

**DECLARATION OF GEOFFREY C. JARVIS IN SUPPORT OF  
PLAINTIFF'S MEMORANDUM OF LAW IN SUPPORT OF MOTION FOR  
LEAVE TO AMEND THE COMPLAINT**

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October 24, 2012

*Counsel for Plaintiff Stichting  
Pensioenfonds ABP*

GEOFFREY C. JARVIS hereby declares under penalty of perjury pursuant to 28 U.S.C. § 1746 that the following is true and correct:

1. I am a director of Grant & Eisenhofer P.A. (“Grant & Eisenhofer”), counsel for Plaintiff Stichting Pensioenfonds ABP (“Plaintiff”). I submit this Declaration in support of Plaintiff’s Memorandum of Law in Support of Motion for Leave to Amend the Complaint. I am familiar with the facts set forth below and able to testify to them.

2. Attached hereto as Exhibit A is a true and correct copy of the proposed amended complaint in this Action.

3. Attached hereto as Exhibit B is a true and correct copy of a redline comparing the proposed amended complaint to the party’s original pleading.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: October 24, 2012

/s/ Geoffrey C. Jarvis  
Geoffrey C. Jarvis